
FW: ACP- 324561-26, SID application in Sligo



From: Simon Dolan (Housing) <Simon.Dolan@npws.gov.ie>

Sent: Friday, October 2, 2026 1:11 PM

To: LAPS <laps@pleanala.ie>

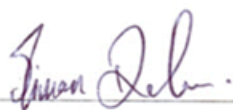
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A chara,

Attached please find the Nature Conservation & Archaeological observations.

Regards,



Simon Dolan

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage
Executive Officer

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigí an Rialtais

Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90



Your Ref: ACP- 324561-26

Our Ref: SID-SL-2026-038

(Please quote in all related correspondence)

2 October 2026

The Secretary
An Comisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to laps@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): Crumhach Wind Farm within the townlands of Crowagh or Dunneill Mountain, Ballyglass, Tawnadremira, Doonbeakin, Dunowla, Kingsmountain, Ballygreighan Barr, Corhawnagh, Abbeytown, Knockaculleen, Rathgoonaun, Lecarrow, Dromore Co. Sligo

A chara

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations coordinated by the Development Applications Unit under the stated headings

Archaeology

It is noted that the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application includes a desk-based Archaeological Impact Assessment (AIA), which was carried out in relation to the proposed development by Tobar Archaeological Services Ltd (EIAR Chapter 14; date 7 August 2026).

The EIAR acknowledges that there is a potential that previously unknown sub-surface archaeological features or deposits may be present within the proposed development site (PDS) which may be negatively impacted by the proposed development. The Department notes that no advance archaeological investigations have been carried out within the PDS to inform the EIAR, other than a walkover survey and the investigation carried out in advance of or during construction of the existing wind farm. The Department advises that advance archaeological test excavation should be carried out prior to any development in any area of new ground disturbance to determine if previously unknown sub-surface archaeological features or deposits are present. If such material is present, then additional mitigation measures to ensure the preservation in situ or preservation by record (i.e. full archaeological excavation) of such discoveries will be necessary. The Department also advises that this can be addressed by the inclusion of an appropriate condition, if the development is permitted.



Notwithstanding this, the Department therefore advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C3, C5 and C6 as set out in *OPR Practice Note PN03: Planning Conditions* (October 2022), with appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

Archaeological Requirements:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 14 of the EIAR (date 7 August 2026) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed new ground disturbance and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the Department of Housing, Local Government and Heritage, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works.
 - a. The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in-situ, preservation by record (archaeological excavation) and/or monitoring may be required.
 - b. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department of Housing, Local Government and Heritage, shall be complied with by the developer.
 - c. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.
3. A suitably qualified archaeologist shall be retained to advise on and establish appropriate Exclusion Zones around the external-most elements of vulnerable Heritage Assets located within the development site (as identified in Chapter 14 of the EIAR or by any subsequent investigations associated with the project).
 - a. Exclusion Zones shall be fenced off or appropriately demarcated for the duration of construction works in the vicinity of the monuments. The location and extent of each Exclusion Zone and the appropriate methodology for fencing off or demarcating at each location shall be agreed in advance with the Department of Housing, Local Government and Heritage and the planning authority.
 - b. No groundworks of any kind (including but not limited to advance geotechnical site investigations) and no machinery, storage of materials or any other activity related to construction will be permitted within Exclusion Zones.
4. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 14 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified



likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.

5. The planning authority and the Department of Housing, Local Government and Heritage shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

Nature Conservation

The Department has reviewed the Natura Impact Statement in relation to potential effects on Ox Mountains Bogs SAC (002006). Based on the information submitted, the Department considers that Further Information is required.

Specifically, the Department recommends that the following matters are addressed before the Commission completes its assessment:

1. The applicant should provide a definitive mapped extent of the L2702/SAC interface, reconciling the different 970m, 860m and 820m figures presented in the Natura Impact Statement (NIS), together with detailed drawings/cross-sections demonstrating the relationship between excavation, drainage and mapped QI peatland habitats.
2. Sufficient hydrological information should be provided to demonstrate that road widening, drainage works and other construction activity adjacent to Ox Mountains Bogs SAC will not alter the hydrological regime supporting wet heath [4010], dry heath [4030], blanket bog [7130] or *Rhynchosporion* habitat [7150].
3. The known Geyer's whorl snail habitat should be secured as a strict exclusion area, clearly mapped and physically protected throughout construction and decommissioning, with no machinery access, laydown, material storage or drainage alteration within the identified sensitive area.
4. The applicant should reconcile the differing stated distances between the Biodiversity Mitigation and Enhancement Plan (BMEP) works and potential 3110/3160 lake habitat and demonstrate that proposed drain blocking, bunding, erosion control and other peatland-restoration works cannot adversely alter the hydrology or water quality of the lacustrine QIs of Ox Mountains Bogs SAC.
5. The BMEP should include enforceable and measurable habitat-condition, hydrological and vegetation targets, an appropriate monitoring period, reporting requirements and



defined remedial triggers. BMEP enhancement measures should remain clearly distinguishable from mitigation relied upon for Appropriate Assessment.

6. The Commission should satisfy itself that the assessment of golden plover and dunlin adequately considers effects on the local breeding populations, including habitat loss, disturbance/displacement and collision risk. Pre-construction survey requirements, species-specific exclusion distances and operational monitoring should be secured.
7. Updated pre-construction otter surveys should be undertaken at watercourses affected by construction, and detailed pollution-prevention measures should be secured for all watercourse crossings and works with hydrological connectivity to European sites.
8. The relationship between the current wind-farm consent and the separately consented 110 kV grid connection should be clarified so that the Commission can be satisfied that all mitigation necessary to support the Article 6(3) conclusion is capable of being implemented and enforced.
9. The Commission should confirm that the submitted bat assessment fulfils the survey scope identified during pre-application consultation, particularly in relation to new greenfield turbine locations, existing-turbine carcass searches, correction of fatality estimates and a sufficiently defined operational monitoring/adaptive mitigation regime.
10. All mitigation upon which the NIS relies should be incorporated into an agreed schedule of measures, with responsibility, timing, monitoring, reporting and remedial actions clearly identified and capable of being secured by condition

The Department considers that without Further Information, it cannot be concluded with the necessary scientific certainty that the proposed development will not adversely affect the integrity of the relevant European sites, particularly Ox Mountains Bogs SAC.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie or to the following address:

The Manager, Development Applications Unit (DAU), Government Offices, Newtown Road, Wexford, Y35 AP90

Is mise le meas,

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration